

REMARKS/ARGUMENTS

The Office Action mailed September 4, 2003 has been reviewed and carefully considered. Before the present Amendment, Claims 1-13 were pending, with Claims 1 and 8 being in independent form. In the present amendment, Claims 1 and 8 have been amended to show proper antecedent basis and Claims ~~13~~¹⁴-19 have been added. After the entry of the present amendment, Claims 1-19 will be pending, with Claims 1, 8, 14, and 15 being in independent form. Reconsideration and withdrawal of the rejections are requested on the basis of the foregoing amendments and following remarks.

In the Office Action dated September 4, 2003, the Examiner rejected all pending claims under 35 U.S.C. §102(e) as anticipated by *Gershman et al.* (US 6,401,085; hereinafter **Gershman**). Applicant respectfully disagrees.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). It is not enough, however, that the reference disclose all the claimed elements in isolation. Rather, as stated by the Federal Circuit, the prior art reference must disclose each element of the claimed invention "arranged as in the claim" (*Lindermann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984)). Thus, even if the prior art reference includes all the elements that are claimed, if the arrangement of the claimed elements is different from the arrangement of the prior art elements, anticipation will not be present.

In the Examiner's anticipation rejection of Claims 1 and 8, the Examiner cites disparate and unconnected elements described in **Gershman** and, on this basis, alleges that **Gershman** teaches the arrangement of elements recited in Claims 1 and 8. However, the elements cited by the Examiner are not arranged in the same manner as the elements in Claims 1 and 8. Indeed, some of the elements cited in **Gershman** by the Examiner appear to have no relationship to each other at all. Furthermore, even if one disregards the fact that **Gershman** does not teach (nor even suggest) the arrangement of elements recited in Claims 1 and 8 of the present application, one still finds that the individual elements cited in **Gershman** by the Examiner do not teach (nor even suggest) the specific elements recited in Claims 1 and 8 of the present application. Some examples follow.

The first element in Claim 1 of the present application is "a mobile terminal comprising a data bus for receiving and transmitting data to a wireless communication network". In the Office Action, the Examiner cites the "(Mobile) Telephone" shown in FIG. 17 of **Gershman** as teaching the "mobile terminal" and then cites "data bus 112" shown in FIG. 1 of **Gershman** as teaching the data bus. However, Claim 1 recites a "mobile terminal *comprising* a data bus" (emphasis added). The "data bus 112" cited by the Examiner in **Gershman** has no relationship with the "(Mobile) Telephone" cited by the Examiner in **Gershman**. This is clear from even a cursory glance at both drawings. There is *no* mobile telephone in FIG. 1 of **Gershman**; in fact, "data bus 112" in FIG. 1 is the data bus of a personal computer workstation (col. 4, lines 43-62, **Gershman**). The mobile telephone in FIG. 17 of **Gershman** is never described in relation to the personal computer workstation of FIG. 1 of **Gershman**: how can the mobile telephone of FIG. 17 possibly comprise the data bus within the personal computer workstation of FIG. 1?

The third element in Claim 1 of the present application is "an interface module connected to the data bus of the mobile terminal". In the Office Action, the Examiner cites the "interface 122" shown in FIG. 1 of **Gershman** as teaching the "interface module" of Claim 1. However, Claim 1 recites a "an interface module **connected to the data bus of the mobile terminal**" (emphasis added). "Interface 122" cited by the Examiner in **Gershman** is *not* connected to the data bus of any mobile terminal. How can "interface 122" of FIG. 1 of **Gershman** disclose "an interface module connected to a data bus of the mobile terminal" when it is not connected to the data bus of *any* mobile terminal?

Moreover, the "interface module" recited in Claim 1 of the present application is comprised of three elements: (1) a "protocol stack", (2) a "user agent", and (3) a "signal generator". It is difficult to tell what the Examiner is citing in **Gershman** as teaching the protocol stack of Claim 1. Regardless, there is *no* "protocol stack" inside an "interface module", as required by Claim 1, in **Gershman**. Similarly, there is *no* "user agent" *nor* "signal generator" which comprise an "interface module", as recited in Claim 1, described in **Gershman**. More importantly, even if these three components were described in **Gershman** (and they are not), the Examiner would still have to show that the three components (i.e., the protocol stack, the user agent, and the signal generator) are described in **Gershman as parts of** "an interface module", as is recited in Claim 1. But this is impossible: there is no "interface module" comprised of a protocol stack, a user agent, and a signal generator described in **Gershman**.

In short, **Gershman** does not anticipate the system recited in Claim 1 of the present invention nor the method recited in Claim 8 of the present invention because (1) **Gershman** does not disclose all the elements recited in either Claim 1 or Claim 8; and (2) the elements in

Gershman which allegedly describe the elements in Claims 1 and 8 of the present application are not arranged in any way, shape, or form, like the elements recited in Claims 1 and 8 of the present application. At least for these reasons, withdrawal of the rejection of independent Claims 1 and 8 is respectfully requested. At least because they depend from independent Claims 1 and 8, which are believed not to be anticipated by **Gershman**, dependent Claims 2-7 and 9-13 are also believed not to be anticipated by **Gershman**.

Furthermore, independent Claims 1 and 8 are patentable over the prior art, including **Gershman**.

Claims 1 and 8 of the present application recite a system and method in which a mobile terminal is connected to "an interface unit" which receives data from the data bus of the mobile terminal. The interface unit processes, decodes, and converts the received data so that it may be reproduced by the output device (as video, audio, and/or textual information). As shown in the exemplary embodiment of FIG. 1 of the present application, Mobile Terminal 12 transmits data to, and receives data from, an interface unit, in this example, a WAP/SMS Interface Module 22, which processes received data and forwards the processed data to the output device, in this example, Display Device 24.

FIG. 2 of the present application provides internal details of the interface unit 22 according to an embodiment of the present invention. As shown in FIG. 2, interface unit 22 (shown by the dotted line) receives data in a protocol stack, in this example, SM-TP Protocol Stack 28' and/or WAP Protocol Stack 28, which processes the received data and then forwards the processed data to user agent 30. User agent 30 decodes the processed data and forwards the

decoded data to the signal generator, in this example, TV Signal Generator 32. The TV Signal Generator 32 converts the decoded data from the user agent 30 into a format suitable for presentation by the output device, in this case, TV Monitor 24. User agent 30 can also transmit data to the protocol stack 28, which will process the data before the data is forwarded to the mobile terminal.

None of the cited prior art, including **Gershman**, teaches or suggests an interface module which (1) processes data received from a mobile terminal; (2) decodes, by a user agent, the processed data; and (3) converts the decoded data from the user agent into signals for presentation by an output device. At least on this basis, independent Claims 1 and 28 are patentable over the cited prior art, including **Gershman**, and the allowance of independent Claims 1 and 28 is respectfully requested. At least because they depend from Claims 1 and 8, which are believed to be in condition for allowance, dependent Claims 2-7 and 9-13 are also believed to be in condition for allowance, which is respectfully requested.

Independent Claims 14 and 15, as well as dependent Claims 16-19, have been added in the present Amendment. None of Claims 14-19 contain new matter: support for newly-added independent Claims 14 and 15 may be found at least in Claims 1 and 8, as well as the text from line 2 of page 7 to line 4 of page 10 of the originally filed specification; and support for newly-added dependent Claims 16-19 may be found in FIG. 2 and the accompanying description from line 16 of page 7 to line 4 of page 10 of the originally filed specification. Newly-added independent Claims 14 and 15 are believed to be in condition for allowance for at least the same reasons that Claims 1 and 8 are believed to be in condition for allowance (see above), which is respectfully requested. At

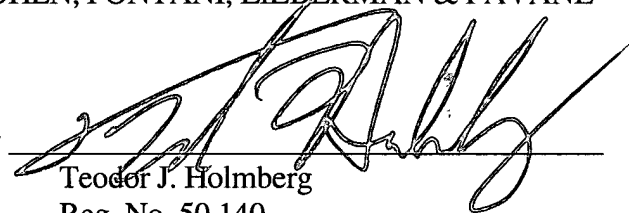
least because Claims 16, 17, 18, and 19 depend from independent Claims 1, 8, 14, and 15, respectively, which are believed to be in condition for allowance, dependent Claims 16-19 are also believed to be in condition for allowance, which is respectfully requested.

For at least the foregoing reasons, all of the presently pending claims (Claims 1-19) of the present application are believed to be in condition for allowance, which is respectfully requested.

Respectfully submitted,

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